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8 **UNITED STATES DISTRICT COURT**

9 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

10

11 APPLIED MEDICAL RESOURCES
12 CORPORATION, a California
corporation,

13 Plaintiff,

14 v.

15 MEDTRONIC, INC., a Minnesota
corporation,

16 Defendant.

17 CASE NO. 8:23-cv-00268-CJC-DFM

18 **STIPULATION TO (1) EXTEND TIME
TO RESPOND TO INITIAL
COMPLAINT BY NOT MORE THAN
30 DAYS (L.R. 8-3) AND (2) EXTEND
RESPONSIVE PLEADING
DEADLINE AN ADDITIONAL 15
DAYS**

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Complaint Served:	2/16/2023
Current Response Date:	3/9/2023
Response Date per L.R. 8-3	4/10/2023
Proposed Response Date	4/24/2023

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1 Defendant Medtronic, Inc. and Plaintiff Applied Medical Resources Corporation
2 jointly stipulate as follows:

3 1. Defendant was served with Plaintiff's complaint on February 16, 2023.
4 Defendant's response deadline is March 9, 2023.

5 2. To allow Defendant to investigate this case, interview and select lead
6 counsel, meet and confer with Plaintiff under Local Rule 7-3, and prepare an appropriate
7 responsive pleading, the parties agree to extend Defendant's responsive pleading deadline
8 by 45 days, up to and including April 24, 2023.

9 3. The parties also agree that Plaintiff will have 45 days to respond to any
10 motion challenging the pleadings filed by Defendant.

11 4. There have been no prior stipulations regarding the extension of time for
12 Defendant to respond to the Complaint.

13 5. Thus, the parties request that the Court issue the following orders: (1) an
14 order approving 15 additional days beyond Local Rule 8-3's 30-day extension for
15 Defendant to respond to the Complaint; and (2) an order permitting Defendant to set any
16 hearing on any motion challenging the pleadings for a date that will give Plaintiff at least
17 45 days to respond to any such motion filed by Defendant.

18 Dated: March 7, 2023

19 GREENBERG TRAURIG, LLP

20 _____
21 /s/ Richard Tabura
22 Robert J. Herrington
23 Richard Tabura
24 Attorneys for Defendant, Medtronic, Inc.

25 Dated: March 7, 2023

26 KNOBBE, MARTENS, OLSON &
27 BEAR, LLP

28 _____
29 /s/ Stephen Larson
30 Stephen Larson
31 Attorneys for Plaintiff, Applied Medical
32 Resources Corporation

ATTESTATION

I, Richard Tabura, am the CM/ECF user whose ID and password are being used to file this Stipulation to (1) extend time to respond to initial complaint by not more than 30 days (L.R. 8-3) and (2) extend responsive pleading deadline an additional 15 days. Pursuant to L.R. 5-4.3.4(a)(2)(i), I hereby attest that Stephen Larson, counsel for Plaintiff, on whose behalf this filing is jointly submitted, has concurred in this filing's content and has authorized the filing.

Dated: March 7, 2023

GREENBERG TRAURIG, LLP

/s/ Richard Tabura

Richard Tabura
Associate Professor

Attorneys for Defendant, Medtronic, Inc.